

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal Case No. 1:14-CR-306
)	
PEDRO ANTHONY ROMERO CRUZ, <i>et al.</i>)	The Honorable Gerald Bruce Lee
)	
Defendants.)	

GOVERNMENT’S RESPONSE TO DEFENDANTS’
MOTION TO EXTEND TIME

The United States hereby responds to defendant Jesus Alejandro Chavez’s motion to extend time for filing evidentiary motions (Doc. No. 442).¹

In light of the fact that the trial date in this case is still over six months away, the government does not oppose the defendant’s motion for additional time to file evidentiary motions and defers to the Court as to any new deadlines.

However, the government does wish to emphasize that it has been diligent in producing discovery in this case. Discovery productions began in November 2014 with a large volume of Spanish-language recordings involving and relating to the defendants and their respective roles in the charged crimes. The government has also produced over 15,000 pages of documents, including, among other things: law enforcement investigative reports (pertaining to both the charged crimes and other criminal racketeering activities involving the defendants); photographic evidence; autopsy reports; telephone records; search warrant returns; and defendants’ statements. The majority of Rule 16 discovery materials were produced by March of 2015.

¹ Defendants Marquez Ayala (Doc. No. 443), Lemus Cerna (Doc. No. 445), Paiz Guevara (Doc. No. 447), Gaitan Benitez (Doc. No. 449), and DeJesus Castillo (Doc. No. 450) have filed motions to join this motion.

The recent discovery productions referenced in defendant's motion largely consisted of materials the government obtained more recently from other investigative agencies and local law enforcement and do not constitute the government's core evidence in this case. In a case of this volume and scope, there will inevitably be additional materials that will come to the government's attention. The government will continue to diligently review and promptly produce any additional discovery.

Respectfully submitted,

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/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 2, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will then send electronic notification of such filing (NEF) to defense counsel on the case.

/s/

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